

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

DANIELLE YVETTE DAVIES
Debtor

Chapter 7

Freedom Mortgage Corporation,
Movant

Case No. 5:23-bk-1194-MJC

v.

Danielle Yvette Davies
and
John J. Martin (Trustee)
Respondents

**DEBTOR'S ANSWER TO FREEDOM MORTGAGE CORPORATION'S
MOTION FOR RELIEF**

1. Admitted.

2. Admitted.

3. Admitted.

4. Denied.

5. After a reasonable investigation, Debtor is unable to admit or deny this allegation, and therefore said allegation is denied.

6. After a reasonable investigation, Debtor is unable to admit or deny this allegation, and therefore said allegation is denied.

7. After a reasonable investigation, Debtor is unable to admit or deny this allegation, and therefore said allegation is denied.

8. Denied as stated. However, Debtor acknowledges that including the June 2023 payment, Debtor had been behind five payments. By way of further response, Debtor has now tendered all required payments.

9. Admitted that on June 1, 2023 Debtor owed five payments. By way of further response, Debtor has now tendered all required payments.

10. Admitted.

11. Denied. Furthermore, Movant has not even *begun* any foreclosure proceedings, including sending any statutorily required notices. Furthermore, Debtor has tendered all required payments.

12. Admitted that Movant is requesting the relief set forth in this paragraph. Denied that such relief is appropriate.

13. Admitted.

14. Denied.

WHEREFORE, Debtor respectfully requests that the Court deny Freedom Mortgage's Motion for Relief, and for all such other and further relief as the Court deems just and proper.

s/ Brett M. Freeman
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